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4 **UNITED STATES DISTRICT COURT**
5 **EASTERN DISTRICT OF CALIFORNIA**
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9 DOROTHEY HEIMBACH,
10 individually and as successor in
11 interest to Anthony Silva,

12 Plaintiff,

13 v.

14 STANISLAUS COUNTY; and
15 JUSTIN CAMARA, ZA XIONG,
16 and ERIC BAVARO, in their
17 individual capacities,

18 Defendants.
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Case No. 2:23-cv-1887-DJC-KJN

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION TO
COMPEL DEFENDANT
STANISLAUS COUNTY TO
PRODUCE DOCUMENTS
RESPONSIVE TO REQUESTS FOR
PRODUCTION**

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23 Having considered Plaintiff's Motion to Compel Defendant Stanislaus County
24 to Produce Documents Responsive to Requests for Production, and good cause
25 appearing therefor:

26 IT IS HEREBY ORDERED that Plaintiff's Motion is GRANTED. Within seven
27 (7) days of this Order, Defendant Stanislaus County shall:

- Produce all use-of-force reports and citizen complaints authored Deputies Justin Camara or Za Xiong;
- Produce internal communications, notes, and memoranda referring to the October 8, 2022 use-of-force incident involving Anthony Silva, with privileged portions redacted; and
- Produce departmental statistics on use of force incidents for the five years preceding October 8, 2022.

IT IS SO ORDERED.

Date:

By: _____

United States Magistrate Judge

Honorable Sheila K. Oberto